

UNITED STATES DISTRICT COURT

for the

Eastern District of North Carolina

Eastern

Division

RECEIVED
OCT 31 2019

PETER A. MOORE, JR., CLERK
US DISTRICT COURT, EDNC
QR

JoAnn Artis Stevens

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Town of Snow Hill, NC, County of Greene NC,
Lenoir Community College and Foundation, NC

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No.

4:19-cv-156-FL

(to be filled in by the Clerk's Office)

Jury Trial: (check one) ☒ Yes ☐ No

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	JoAnn Artis Stevens and Rosenwald Center
Street Address	712 West Harper Street
City and County	Snow Hill
State and Zip Code	NC 28580
Telephone Number	252-933-9490
E-mail Address	jartissteven@yahoo.com

E-mail Address *(if known)***II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☒ Federal question ☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Violation of 14th Amendment Rights Claimed Under Color of Law 42 U.S. Code § 1983. Civil action for deprivation of rights. Every person who, under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia, subjects, or causes to be subjected, any citizen of the United States or other person within the jurisdiction thereof to the deprivation of any rights, privileges, or immunities secured by the Constitution and laws, shall be liable to the party injured in an action at law, suit in equity, or other proper proceeding for redress.

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* _____, is a citizen of the State of *(name)* _____.

b. If the plaintiff is a corporation

The plaintiff, *(name)* _____, is incorporated under the laws of the State of *(name)* _____ and has its principal place of business in the State of *(name)* _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (*if known*). Attach additional pages if needed.

Defendant No. 1

Name Town of Snow Hill

Job or Title (*if known*)

Street Address 908 S.E. Second Street

City and County Snow Hill Greene

State and Zip Code N.C. 28580

Telephone Number 252-747-3414

E-mail Address (*if known*)

Defendant No. 2

Name County of Greene

Job or Title (*if known*)

Street Address 229 Kingold Blvd.

City and County Snow Hill, Greene

State and Zip Code 28580

Telephone Number 252-747-3446

E-mail Address (*if known*)

Defendant No. 3

Name Lenoir Community College and Foundation

Job or Title (*if known*)

Street Address 231 Hwy 58 South, P.O. Box 188

City and County Kinston, Lenoir

State and Zip Code NC 28502-0188

Telephone Number 252-527-6223

E-mail Address (*if known*)

Defendant No. 4

Name

Job or Title (*if known*)

Street Address

City and County

State and Zip Code

Telephone Number

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

Defendants saw an Economic Benefit for the Town of Snow Hill, The County of Greene and Lenoir Community College from the work of preservation being undertaken by Plaintiff, JoAnn Artis Stevens and saw Plaintiff JoAnn Artis Stevens as Human Capital, Defendants perfunctorily supported the initial, critical efforts of National Register Nomination of Snow Hill Colored School, hiring a Consultant for Program Development and establishing partnerships to later engage in Conspiracy of Rights of Plaintiff by working together to exclude Plaintiff from project Deprivation of Rights without Due Process of Law, Conspiracy Against Rights, Discrimination against a Woman, Activist, Advocate for Historic Preservation of Rosenwald Schools, Economic Development in the Low to Moderate Income Area of West Harper Street, Locking Plaintiff out of the catalyst of Plaintiffs efforts and ability to move forward.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Preliminary (TRO) Injunction, \$10 million U.S. Dollars - To be restored our dignity and character as a reputable CEO of a Community Development Corporation,
To be put back in the place I was with office at the Snow Hill Colored School without rent and complete access to the Snow Hill Colored School and its surrounding properties, phone and internet service, total and complete access to the Rosenwald Memorial Ball Field and total and complete access to the South Greene High School Gym without rental requirements

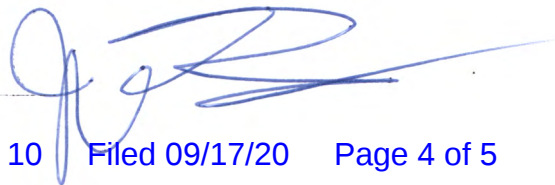
V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 08/25/2019



The defendant, (name) _____, is a citizen of
the State of (name) _____. Or is a citizen of
(foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) Town of Snow Hill, County of Greene, is incorporated under
the laws of the State of (name) North Carolina, and has its
principal place of business in the State of (name) North Carolina.
Or is incorporated under the laws of (foreign nation) _____,
and has its principal place of business in (name) _____.

*(If more than one defendant is named in the complaint, attach an additional page providing the
same information for each additional defendant.)*

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at
stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

From 1999 until present Defendants have Deprived Plaintiff of Rights Under the Color of Law and have refused to consider human capital of Plaintiff brought to the Town of Snow Hill, The County of Greene and Lenoir Community College by Plaintiff stopping Defendants from demolishing a valuable African American School and advocating preservation and restoration thereof to include the surrounding community. Plaintiffs efforts brought major benefits, plans, partnerships to Snow Hill, County of Greene, Lenoir Community College of which Defendants realized and perfunctorily partnered to the point of adopting resolutions to restore the Snow Hill Colored School while excluding and failing to consider Plaintiff and treating Plaintiff different from other Nonprofit Leaders, to the demise of Plaintiff's reputation as a Community Development Leader, Activist, Advocate for Low to Moderate Income Area of West Harper Street while watching the work, processes, being overtaken by Defendants to the detriment of a Woman, Activist, Advocate, Community Development Leader, making null and void the funding, time, energy, joy, excitement, sense of self worth brought by this amazing Project. Plaintiff has not realized due to deprivation of rights, the restoration of Snow Hill Colored School/Rosenwald Center, Development of African American Tourism a billion dollar industry, The completion of "The Corner" Historic District, The Development of "Bridges to Security Housing Development Program under a Capacity Building Grant from Department of Community Assistance, The sense of self worth, fulfillment, enjoyment of advancing Plaintiffs cause to help Low to Moderate Income Areas and African American Historic Activities. In 2015 After being denied over and over and Defendants publishing their plans and efforts to restore Snow Hill Colored School/Rosenwald Center in partnership with others, the humiliation was too much for Plaintiff's husband and children, Plaintiff was humiliated daily and it became hard to go out and face the people of her community. Plaintiff moved out of Snow Hill into a country home away from the Town of Snow Hill. In 2018 Plaintiff realized she was depressed and had isolated herself and this was not good nor normal,